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Denise Subramaniam
Self-represented
13865 SW Walker Rd
Beaverton OR 97005
503-764-5300

**UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION**

LNV CORPORATION

Plaintiff,

v.

DENISE SUBRAMANIAM

pro per

Defendant

Civil Case No. 3:14-cv-01836

**DEFENDANT'S MOTION FOR
MEDICAL CONTINUANCE**

JURY TRIAL DEMANDED

DEFENDANT'S MOTION FOR MEDICAL CONTINUANCE

Here comes Defendant Denise Subramaniam, representing herself, and hereby motions this court for a 120 day medical continuance. The prior joint motions for time extension written and filed by counsel for Plaintiff LNV were unopposed and granted based on medical reasons specific to a spinal injury.

Defendant emailed counsel for Plaintiff, Gabby Richards, but she is out of the office. Defendant phoned Perkins Coie and so far no one else from Perkins Coie has responded. Due to the urgency of this motion Defendant had no choice but to file this motion for continuance not knowing whether it will be opposed or unopposed. Defendant's response to LNV's response to her response to LNV's complaint is due tomorrow and Defendant is scheduled for a series of medical appointments and tests tomorrow.

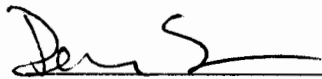
Defendant had provided copies of her medical records to counsel for Plaintiff and was grateful to have the previous motions for time extensions prepared and filed by them in spite of stipulations because doing so herself would have been a hardship. However she was concerned because this was done without any

information being offered to the court as to the reason such extensions were necessary. Defendant was at the time unaware of the extent of injury or what future medical procedures would be required.

Last week Defendant learned that neurology tests showed nerve damage and spinal surgery is recommended. Please see the letter from Defendant's neurosurgeon, Dr. Michael Sandquist; attached herein as Defendant's Exhibit A. His letter doesn't indicate the expected duration of pre-surgery testing he mentions in his letter, but medical records and oral explanation of the surgical process provided to Defendant has set this duration at between 20 to 30 days after which time a date for surgery will be set. Dr. Sandquist's letter does state that a 90-day post surgery recovery period is expected.

WHEREFORE Defendant prays this court grant a 120 day medical continuance on all deadlines and scheduled dates in this case.

Respectfully,

A handwritten signature in dark ink, appearing to read 'Denise', followed by a horizontal line.

Denise Subramaniam